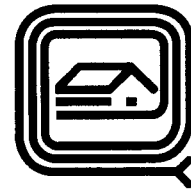
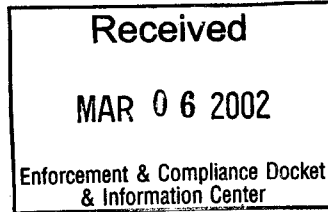


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Archives/Library Division

Ohio Historical Center
1982 Velma Avenue
Columbus, Ohio 43211-2497
614/297-2510
Fax: 614/297-2546
www.ohiohistory.org



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21 February 2001

United States Environmental Protection Agency
Enforcement and Compliance Docket and Information Center (Mail Code 2201A)
Attn: Docket Number EC-2000-007
1200 Pennsylvania Avenue NW
Washington DC, 20460

Overall *the Proposed Rule: EPA Establishment of Electronic Reporting: Electronic Records* adequately creates guidelines and requirements for electronic recordkeeping of reliable and authentic electronic records. I do have several comments regarding electronic records management and preservation that I believe EPA should consider.

USEPA has demonstrated a thorough understanding of electronic recordkeeping issues and the importance of creating and maintaining reliable and authentic records. However, in our experience, these are not concepts that many state and local entities are aware of and concerned about. Most state and local government entities do not understand the importance of and implementation of managing electronic records in electronic recordkeeping systems. It is also true that recordkeeping capabilities are not generally built into current software and systems, making implementation difficult if not impossible. However, it can be argued that federal recordkeeping requirements will drive the IT industry to begin recognizing and implementing recordkeeping requirements in software and systems. Thus, this lack of *current* recordkeeping capabilities should not cause USEPA to weaken or negate these necessary requirements. Additionally, if they have not already done so, USEPA should review DoD 5015.2 recordkeeping requirements. They should also be in good communication with NARA electronic records staff as these recordkeeping systems are designed.

The commitment to the long term preservation of electronic documents and resources could be problematic. There is currently no way to guarantee that electronic documents will be reliable, authentic and accessible in the long term. The long term preservation of digitally signed electronic documents could be even more problematic given the added obstacles of preserving the appropriate technological infrastructure that this technology relies on. USEPA should strongly consider a requirement to output electronic documents with long term retention requirements to paper or microfilm. If this is not an option, then they need to consider the necessity of creating additional metadata, migration documentation requirements, format requirements, and preservation plans for electronic records that have long term retention periods.

Thank you for this opportunity to comment on this proposed rule. Please feel free to contact me if you have any questions.

Judy Cobb

A handwritten signature in cursive script that reads "Judy Cobb".

Assistant State Archivist
jcobb@ohiohistory.org ~ 614-297-2585